UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF:

GENERAL MOTORS CORP, et al.,

Debtors.

Bankruptcy Case No. 09-50026 (REG) Honorable Robert E. Gerber Chapter 11 Jointly Administered

MOTION OF ATTORNEYS MARK L. MCALPINE, DON W. BLEVINS AND DAVID M. ZACK FOR ADMISSION TO PRACTICE, PRO HAC VICE

Attorney Don W. Blevins respectfully requests admission, pro hac vice, before the Hon. Robert E. Gerber, for Attorney Mark L. McAlpine, a member in good standing of the Bar of the State of Michigan and the U.S. District Court for the Eastern District of Michigan, Don W. Blevins, a member in good standing of the bar of the State of Michigan and the U.S. District Court for the Eastern District of Michigan, and Attorney David M. Zack, a member in good standing of the bar of the State of Michigan and the U.S. District Court for the Western District of Michigan, to represent MCM Management Corp. and other clients in connection with the above-referenced Chapter 11 cases and related proceedings. The \$25.00 filing fee for this motion has been submitted.

Mock L. WicAlpine (P35583) Don W. Blevins (P64146)

David M. Zack (P69944)

MCALPINE & ASSOCIATES, P.C. 3201 University Drive, Suite 100 Auburn Hills, MI 48326 (248) 373-3700 mlmcalpine@mcalpinelawfirm.com dwblevins@mcalpinelawfirm.com dmzack@mcalpinelawfirm.com

Dated: June 12, 2009

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF:

GENERAL MOTORS CORP, et al.,

Debtors.

Bankruptcy Case No. 09-50026 (REG) Honorable Robert E. Gerber Chapter 11 Jointly Administered

General Motors Corporation

Mailcode 480-206-114

30009 Van Dyke Avenue Warren, MI 48090-9025

Attn: John Rapisardi, Esq.

New York, NY 10281

Attorney for Purchaser

One World Financial Center

Cadillac Building

Attn: Warren Command Center,

Cadwalader, Wickersham & Taft LLP

PROOF OF SERVICE

Don W. Blevins of McAlpine & Associates, P.C., hereby certifies that on the 12th day of June, 2009, he mailed a copy of the Motion of Attorneys Mark L. McAlpine, Don W. Blevins and David M. Zack for Admission to Practice, Pro Hac Vice; Proposed Order; and Proof of **Service**; by placing same in an envelope via Federal Express on the following:

Office of the United States Trustee

Attn: Diana G. Adams, Esq. 33 Whitehall Street 21st Floor New York, NY 10004

Weil, Gotshal & Manges, LLP

Attn: Harvey Miller, Esq. Stephen Karotkin, Esq. Joseph H. Smolinsky, Esq. 767 Fifth Avenue New York, NY 10153 Attorney for the Debtors

Cleary Gottlieb Steen & Hamilton LLP Vedder Price, P.C. Attn: Michael J. Edelman, Esq.

Attn: James L. Bromley, Esq. One Liberty Plaza New York, New York 10006 Attorney for UAW

1633 Broadway 47th Floor New York, NY 10019 Attorneys for Export Development Canada

Michael L. Schein, Esq.

U.S. Treasury

Attn: Matthew Feldman, Esq. 1500 Pennsylvania Avenue NW Room 2312 Washington, D.C. 20220

Cowen Weiss and Simon LLP

Attn: Babette Ceccotti, Esq. 330 W. 42nd St New York, NY Attorney for UAW

U.S. Attorney's Office

New York, NY 10007

S.D.N.Y. Attn: David S. Jones, Esq. Matthew L. Schwartz, Esq. 86 Chambers Street, Third Floor

Gordon Z. Novod

Kramer Levin Naftalis & Frankel LLP 1177 AVENUE OF THE AMERICAS New York, NY 10036 Attorney for Creditors Committee

Mark L. WicAlpine (P35583)

Jon W. Blevins (P64146)

David M. Zack (P69944)

MCALPINE & ASSOCIATES, P.C.

3201 University Drive, Suite 100 Auburn Hills, MI 48326

(248) 373-3700

mlmcalpine@mcalpinelawfirm.com dwblevins@mcalpinelawfirm.com dmzack@mcalpinelawfirm.com

Dated: June 12, 2009